

# **EXHIBIT**

## **A**

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*Attorneys for Defendant United Therapeutics Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

SANDOZ INC.,

Plaintiff,

v.

UNITED THERAPEUTICS  
CORPORATION,

Defendant.

Civil Action No. 2:19-cv-10170-BRM-  
JSA

**DECLARATION OF JAMES  
EDGEMOND IN SUPPORT OF  
DEFENDANT UNITED  
THERAPEUTICS  
CORPORATION'S MOTION TO  
STAY OF EXECUTION OF  
JUDGMENT PENDING APPEAL  
WITHOUT BOND**

I, JAMES EDGEMOND, hereby declare as follows:

1. I am the Chief Financial Officer and Treasurer of United Therapeutics Corporation (“UTC”).

2. I am aware that the Court in this matter is expected to issue a monetary judgment in favor of plaintiff Sandoz, and that the amount of the Judgment is expected to be between \$65,119,925 and \$80,890,763, inclusive of prejudgment interest (the “Judgment”).

3. If the Judgment were to become final after any appeals are exhausted (the “Final Judgment”), the process by which Sandoz might collect the Final Judgment from UTC would not be complex. UTC’s Finance Department can readily pay the Final Judgment amount via wire transfer within ten (10) business days from receiving the Court’s Final Judgment and Sandoz’s wire transfer instructions.

4. UTC has the financial ability to satisfy the Final Judgment. As of June 30, 2024, UTC maintains \$1.36 billion of cash on hand and cash equivalents, which can readily be used to pay the Final Judgment, if necessary. If marketable investments are included, UTC maintains approximately \$4.30 billion of cash on hand as of June 30, 2024.

5. UTC’s total revenue, the total amount of money that UTC earned from all of its sources before subtracting any expenses or deductions, in 2023 was \$2,327.5 million. UTC’s net income, the total amount of money left over after UTC

paid all of its expenses, in 2023 was \$984.8 million. Through the end of the second quarter of 2024, UTC's total revenue is \$1,392.6 million. Through the end of the second quarter of 2024, UTC's net income in 2024 is \$584.7 million.

6. UTC has worked with a surety agent, Chubb, and is confident it can promptly secure a supersedeas bond in an amount set by the Court if the Court does not waive the bond requirement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 28, 2024

BY:



James Edgemon